IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NORTH CAROLINA SOUTHERN DIVISION No. 7:23-CV-897

IN RE:)	
)	
CAMP LEJEUNE WATER)	
LITIGATION)	
) DECLARAT	ION OF
This Document Relates to:) MIKKI W.	WHITE
ALL CASES)	
)	

- I, Mikki W. White, of full age, pursuant to section 1746 of title 28 of the United States Code, hereby declare under penalty of perjury the following is true and correct:
- 1. I am over the age of 18 and competent to make this declaration. I am familiar with the facts contained herein based upon my personal knowledge. I am a citizen and resident of Onslow County, North Carolina.
- 2. I am the Administrative Assistant Onslow County Clerk of Court in Jacksonville, North Carolina. Our Office handles estate and probate filings.
 - 3. The Camp Lejeune Justice Act ("CLJA") was signed into law on August 1, 2022.
- 4. Since 2022, our Office has been opening estates for decedents and those applying to be administrators on their behalf, including many non-resident decedents, for CLJA purposes. Our Office administers these proceedings and processes incoming inquiries and requests and applications to open new estates for decedents. We also administer requests and applications to re-open closed estates for CLJA decedents.

 $[\]frac{\text{https://www.navy.mil/clja/\#:}\sim:\text{text=On\%20August\%2010\%2C\%202022\%2C\%20President,(PACT)\%20Act\%20of\%202022}{202022}$

- 5. All of the estates our Office opens and administers for CLJA decedents are in addition to our normal annual caseload of non-CLJA estates which our Office ordinarily administers.
- 6. We perform our professional duties pursuant to North Carolina law and using forms promulgated by the North Carolina Administrative Office of Courts so that the appointed estate representatives may resolve estates, pursue claims if that is their goal and otherwise exercise their legal rights and duties.
- 7. Based on a review of our records, we have provided some information regarding trends in case filings in the Onslow Clerk's Office for estates. See Exhibit 1.
- 8. The records reflect with regard to CLJA-related estate proceedings that were filed and opened with our Office, starting in February 2022:

Month	New estate files opened
February 2022	2
March 2022	4
April 2022	2
May 2022	4
June 2022	5
July 2022	7
August 2022	7
Sept 2022	23
October 2022	27
Nov 2022	29
December 2022	43
Total 2022:	153 estate files.

9. As shown above, the number of CLJA files we opened for Camp Lejeune decedents in 2022 came to 153 files. As shown below, this total for 2022 increased by over 15 (fifteen) times for 2023:

Month	New files opened.	Old files re-opened.	
January 2023	43	10	
February 2023	64	21	
March 2023	129	37	
April 2023	112	17	
May 2023	195	23	
June 2023	186	10	
July 2023	201	44	
August 2023	290	28	
September 2023	255	27	
October 2023	276	9	
November 2023	295	16	
December 2023	289	13	
Total 2023:	New: 2,335	Reopened: 244	
Grand Total for 2023 · 2 570			

Grand Total for 2023: 2,579.

- As shown above, starting in 2023, CLJA claimants also began to file proceedings 10. with our Office to reopen previously closed estates. When those 2023 file re-openings are combined with the 2023 new file openings, the grand total for 2023 was 2,579 files. This was an unprecedented amount of work to be placed upon our limited staff and has resulted in an increasing backlog of incoming materials and applications for the opening of yet more new and re-opened estates. The current backlog is about 250 cases.
 - 11. The information our Office has for year 2024 so far shows:

Month	New files opened.	Old file re-opened.
January 2024	267	31
February 2024	307	40
March 2024	414	43
April 2024		
Total so far 2024:	New: 988	Reopened: 114
Grand Total: 1,102.		

12. Opening each estate file is a significant task. Our Office must complete a series of steps and address numerous varieties of incoming telephone calls, emails and other correspondence, hand-delivered materials and filings to include 90-day inventories and annual

accountings for the duration of the litigation case and mailed documents. Our Office has limited resources.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 23^{rd day} of April in Jacksonville, North Carolina.

Mikki W. White, Assistant Clerk of Court